

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Chapter 13

LEON D. CHAMBERS

Debtor

Case No.: 19-14923

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**DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY  
FILED BY PNC BANK, NATIONAL ASSOCIATION**

Debtor-Respondent, Leon D. Chambers (hereafter "Debtor") responds to the Motion of PNC Bank, National Association for Relief from the Automatic Stay, as follows:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Debtor specifically denies the allegations of Paragraph 6 of PNC's Motion and strict proof is demanded.
7. Denied. Petitioner did not provide any evidence of fees and costs incurred.
8. Denied. Debtor specifically denies the allegations of Paragraph 8 of PNC's Motion and strict proof is demanded.
9. Denied. Debtor specifically denies the allegations of Paragraph 9 of PNC's Motion and strict proof is demanded.
10. Admitted.

11. Denied. Debtor specifically denies the allegations of Paragraph 11 of PNC's Motion and strict proof is demanded.

WHEREFORE, Debtor respectfully requests an Order denying PNC Bank National Association's Motion For Relief from the Automatic Stay.

Date: May 20, 2022

BY:/s/. Ashley M. Sullivan  
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